

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

WALTER CHOW, as Administrator of the Estate of
LEROY CHOW, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

SHOREFRONT OPERATING LLC d/b/a SEAGATE
REHABILITATION AND NURSING CENTER;
SHAINDY BERKO; ROCHEL DAVID; LEAH
FRIEDMAN; DEENA LANDA; ESTHER
FARKOVITZ; AVI PHILIPSON; BERISH
RUBINSTEIN; DAVID RUBINSTEIN; BRUSCHA
SINGER; JOEL ZUPNICK; SHOREFRONT REALTY
LLC; SENTOSACARE, LLC; and DOES 1-25,

Defendants.

Civil Action
No. 1:19-cv-03541-FB-JRC

**NOTICE OF MOTION
FOR LEAVE TO FILE SECOND AMENDED CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE that plaintiff Walter Chow, as the Administrator of the Estate of Leroy Chow, individually and on behalf of all others similarly situated, moves the Court to grant him leave to file his second amended class action complaint pursuant to Rules 15, 16, 20, and 21 of the Federal Rules of Civil Procedure. This motion is based upon this notice of motion, the accompanying memorandum of points and authorities, and exhibits thereto. The grounds for this motion are set forth in the accompanying Memorandum in Support, which is incorporated fully herein.

Dated: White Plains, New York
January 28, 2022

Respectfully Submitted,

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FREI-PEARSON & GARBER, LLP**

By: /s/John D. Sardesai-Grant

D. Greg Blankinship

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Attorneys for Defendants

CERTIFICATE OF SERVICE

I certify that on the 28th day of January, 2022, I caused a true copy of Plaintiff's Motion For Leave To File A Second Amended Class Action Complaint and accompanying Memorandum in Support, and Exhibits to be served by the Court's CM/ECF system upon counsel for Defendants.

By: /s/John D. Sardesai-Grant
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